

AMES LABORATORY

CHRONIC BERYLLIUM DISEASE PREVENTION PLAN (CBDPP)

This plan meets the requirements for a written Chronic Beryllium Disease Prevention Plan (CBDPP) stated in 10 CFR Part 850 – Chronic Beryllium Disease Prevention Program. Specifically, the plan describes existing conditions at the Ames Laboratory and the procedural controls that ensure employee protection from beryllium exposures that may cause adverse health effects such as berylliosis and chronic beryllium disease.

1.0 APPROVAL RECORD

- **Reviewed by:** Amy Tehan, Document Control Coordinator
- **Approved by:** Tom Wessels, ESH&A Manager
- **Approved by:** Dr. Steve Sheldahl, Occupational Medicine Director
- **Approved by:** Dr. Bruce Harmon, Deputy Director
- **Approved by:** Dr. Alex King, Laboratory Director

The official approval record for this document is maintained in the Training & Records Management Office, 151 TASF.

2.0 REVISION/REVIEW INFORMATION

The revision description for this document is available from and maintained by the author.

3.0 PURPOSE & SCOPE

The Ames Laboratory is a government-owned, contractor-operated research and development laboratory of the United States Department of Energy (DOE). Iowa State University is the contractor and the Laboratory is physically located on the University campus. The majority of the Laboratory's principal investigators hold split appointments as faculty members in departments that correspond with their scientific disciplines. Furthermore, a major contribution to the Laboratory's technical effort is made by the approximately 150 University graduate students who work at the Laboratory at any given time and who are appointed to Laboratory-supported research assistantships. In addition, there are approximately 65 graduate-student associates who work in the Laboratory's research programs but whose financial assistance (stipends) comes from other sources. The Ames Laboratory conducts no classified research, there is no classified information on the site, and no classified information will be received on site.

The Laboratory's research strengths include materials synthesis and processing, environmental technology development, chemical analysis, chemical sciences, photosynthesis, materials sciences, and applied mathematical sciences. The Laboratory relies upon its strengths to conduct the long-term basic and intermediate-range applied research needed to solve the complex problems encountered in energy production and utilization as well as environmental restoration and waste management.

This plan establishes a chronic beryllium disease prevention program (CBDPP) that is integrated into the Laboratory's Integrated Safety Management System ([ISMS](#)).

3.1 Definitions

The DOE standard contains definitions in section 850.3. Select terms and their meanings are given below and critical to understanding beryllium usage at Ames Laboratory:

Beryllium means elemental beryllium and any insoluble beryllium compound or alloy containing 0.1 percent beryllium or greater that may be released as an airborne particulate.

Beryllium activity means an activity that can expose workers to airborne beryllium, including but not limited to design, construction, operation, maintenance, or decommissioning, and which may involve one DOE facility or operation or a combination of facilities and operations.

Beryllium article means a manufactured item that is formed to a specific shape or design during manufacture, that has end-use functions that depend in whole or in part on its shape or design during end use, and that does not release beryllium or otherwise result in exposure to airborne concentrations of beryllium under normal conditions of use.

Beryllium-associated worker means a current worker who is or was exposed or potentially exposed to airborne concentrations of beryllium at a DOE facility, including: (1) A beryllium worker; (2) A current worker whose work history shows that the worker may have been exposed to airborne concentrations of beryllium at a DOE facility; (3) A current worker who exhibits signs or symptoms of beryllium exposure; and (4) A current worker who is receiving medical removal protection benefits.

Beryllium worker means a current worker who is regularly employed in a DOE beryllium activity.

Worker means a person who performs work for or on behalf of DOE or the Ames Laboratory, including a DOE employee, an independent contractor, a DOE contractor or subcontractor employee, or any other person who performs work at a DOE facility.

Given the above definitions of “beryllium activity” and “beryllium-associated worker”, Ames Laboratory considers all current Facilities and Engineering Services personnel as “beryllium associated workers” and subject to the provisions of this Plan.

3.2 Enforcement

The DOE may take appropriate steps under its contracts with DOE contractors to ensure compliance with this part. These steps include, but are not limited to, contract termination or reduction in fee.

3.3 Applicability

Beryllium was regularly used at Ames Laboratory during the 1940's and early 1950's. Documentation shows that several Ames Laboratory employees were exposed to beryllium during activities that generated ambient concentrations of beryllium-containing dust. Since the early 1950's, beryllium has been used infrequently at the Laboratory and under conditions that wouldn't be expected to generate significant exposure potential.

Today, Ames Laboratory conducts very limited research involving beryllium-containing materials or beryllium articles (see definitions). Section 5.0 provides an overview of where beryllium is found at Ames Laboratory.

The DOE standard Part 850 – Chronic Disease Prevention Program applies to the following situations:

- (1) DOE offices responsible for operations or activities that involve present or past exposure, or the potential for exposure, to beryllium at DOE facilities;
- (2) DOE contractors with operations or activities that involve present or past exposure, or the potential for exposure, to beryllium at DOE facilities; and
- (3) Any current DOE employee, DOE contractor employee, or other worker at a DOE facility who is or was exposed or potentially exposed to beryllium at a DOE facility.

The DOE standard does not apply to the following situations:

- (1) Beryllium articles; and
- (2) DOE laboratory operations that meet the definition of laboratory use of hazardous chemicals in 29 CFR 1910.1450, Occupational Exposure to Hazardous Chemicals in Laboratories.

3.4 Exposure Groups

Beryllium usage resulted in contamination of several Ames Laboratory buildings.

Sampling and characterization data can be found at:

<http://www.ameslab.gov/operations/esha/beryllium-information>. Consideration of the data collected to date suggests 4 exposure groups that are summarized as follows:

General Public – these are individuals located outside the Ames Laboratory buildings on the campus of Iowa State University.

Beryllium Exposure Potential: Negligible. Environmental testing conducted in accordance with protocols established by the Environmental Protection Agency showed ambient levels of beryllium well below standards established by the Clean Air Act.

Ames Laboratory Visitors – Ames Laboratory has a variety of visitors including school/civic groups, visiting scholars/scientists and contract personnel such as equipment repair staff.

Beryllium Exposure Potential: Negligible. Air sampling in occupied areas of the Laboratory has consistently shown non-detectable ambient levels of airborne beryllium.

Research Staff – individuals that occupy and conduct work in offices and laboratories in any Ames Laboratory building.

Beryllium Exposure Potential: Minimal. Extensive surface testing has shown several cases of beryllium contamination above Department of Energy release limits in isolated areas of occupied spaces. In general, these surfaces are physically inaccessible (e.g. the top of a ceiling-mounted ventilation duct) or remotely located (e.g. the inside of a piece of equipment).

Facilities/Operational Staff – Laboratory personnel responsible for maintenance and renovation activities associated with Ames Laboratory buildings.

Beryllium Exposure Potential: Minimal. Facilities & Engineering Services activities are conducted under an approved Readiness Review. Activities with potential to interact/disturb areas with legacy beryllium surface contamination have been identified and reviewed for exposure potential. Procedures have been implemented that require the use of exposure controls (e.g. ventilation and/or personal protective equipment) that have been tested and confirmed to reduce exposure potential to a minimal level.

4.0 ROLES AND RESPONSIBILITIES

Implementation of the CBDPP will be the responsibility of several entities. Specifically, roles and responsibilities as they apply to implementation of the CBDPP are as follows:

- 4.1 Laboratory Director** – The Laboratory Director is ultimately responsible for implementation of all safety and health programs at Ames Laboratory. Programmatic responsibilities are delegated through the line organization as stated below.
- 4.2 Program Director** – Program Directors shall be aware of all ES&H issues associated with the use of beryllium at Ames Laboratory. Programs Directors shall assure that all Group Leaders within their program are aware of issues related to work with beryllium and that all work is approved by the Safety Review Committee via the Readiness Review process.
- 4.3 Group Leader** – Group Leaders shall be aware of beryllium or beryllium-containing compounds in their laboratory spaces and assure that all laboratory work with beryllium is done in accordance with an approved Readiness Review that documents appropriate controls that reduce or eliminate exposure potential. The same requirement applies to all Facilities and Engineering Services work in areas with suspected beryllium contamination above DOE limits.
- 4.4 Employee** – Employees working with beryllium shall be authorized by Group Leaders and have received appropriate training as dictated by the Readiness Review process.
- 4.5 Occupational Medicine** – Occupational Medicine shall be responsible for addressing any medical surveillance or health concerns related to use of beryllium at Ames Laboratory. Occupational Medicine staff shall coordinate the submission of updated information to the beryllium registry.
- 4.6 Environment, Safety, Health & Assurance** – ESH&A shall serve as the Laboratory's point-of-contact on beryllium issues related to past work with beryllium, exposure monitoring and other programmatic requirements such as the maintenance of the written program.

5.0 PREREQUISITE ACTIONS AND REQUIREMENTS

There are no prerequisite actions or requirements associated with implementation of this plan.

6.0 PROGRAM INFORMATION

6.1 Development and approval of the CBDPP (850.10)

The Ames Laboratory CBDPP was prepared by the Industrial Hygienist, reviewed by the ESH&A Manager and Occupational Medicine Director and approved by the DOE Site Manager.

6.2 General CBDPP requirements (850.11)

The CBDPP covers all work activities that may involve potential exposure to beryllium. Specifically, any research activities involving beryllium shall be covered by this Plan as well as any facilities or engineering services activities that may involve potential for incidental exposure to beryllium dust such as accessing interstitial areas that may have above background surface concentrations of beryllium. For specific information on how employee exposures will be minimized or eliminated, see Section 4.2 - Hazard Assessment.

6.3 Compliance (850.13)

Compliance with the CBDPP will be assessed annually by the ESH&A office at Ames Laboratory as a part of the review discussed in section 4.19 – Performance Feedback.

6.4 Baseline beryllium inventory (850.20)

Beryllium and/or beryllium-containing materials currently at Ames Laboratory are identified in Table 1 on the next page.

6.5 Hazard Assessment (850.23)

A beryllium hazard assessment includes an analysis of existing conditions, exposure data, medical surveillance trends and the exposure potential of planned activities. The inventory table lists “Exposure Potential” in the last column.

6.6 Airborne & Surface Beryllium Limits (850.23)

Ames Laboratory does not anticipate any usage of beryllium that would result in significant airborne concentrations. All activities with any potential for the generation of ambient beryllium will be monitored by the ESH&A Certified Industrial Hygienist and be conducted using available engineering controls (ventilation) and appropriate personal protective equipment (PPE) (gloves, respirator, Tyvek, etc.). Monitoring results will be interpreted relative to salient exposure limits including the Permissible Exposure Limit (PEL) of 2.0 micrograms/cubic meter of air established by the Occupational Safety & Health Administration (OSHA). The PEL is an 8-hour time-weighted average limit. (NOTE: See also Section 5.4 - Action Level)

There are no surface contamination limits established by OSHA. Ames Laboratory will consult the following limits established by the DOE: 0.2 micrograms per 100 square centimeters of surface for “general release to the public”; 3.0 micrograms per 100 square centimeters of surface for continued use in a “beryllium facility”.

6.7 Action Level (850.23)

In addition to the PEL discussed in Section 5.3, Ames Laboratory will also consult the established action level limit of 0.2 micrograms/cubic meter of air. In the unlikely event that the action level is exceeded, Ames Laboratory will implement the provisions described in 850.23 (b) including periodic monitoring, exposure reduction and minimization, establishment of regulated areas, provision of hygienic facilities, use of PPE and appropriate signage.

6.8 Exposure Monitoring (850.24)

All exposure monitoring for beryllium will be conducted by a Certified Industrial Hygienist and in accordance with Section 850.24 of the regulation.

6.9 Exposure Reduction and Minimization (850.25)

All work with beryllium, beryllium-containing materials and interactions with surfaces contaminated with beryllium will be conducted so as to reduce the likelihood of any exposure to the lowest possible level. Engineering controls will be utilized whenever feasible to control generation of ambient concentrations of beryllium and thereby eliminate potential exposures to employees. Administrative and personal protective equipment controls will also be used when indicated as means to reduce the likelihood of exposure.

Program	Building & Room	Group Leader	Item	Exposure Potential
Division of Material Science & Engineering	A221 Zaffarano	Goldman	Beryllium is a constituent of windows used for cryostats and x-ray beam paths; Be has a low Z value and therefore low absorption	Negligible; Be is part of window; windows are rarely handled and do not become embrittled; window meets definition of "article"
	348 Spedding Hall	Corbett	Beryllium is constituent of x-ray window (see above comments)	Negligible (see above comments)
	B8 Spedding Hall	Houk	Dilute aqueous Be solutions are used rarely; concentrations are <10 parts per billion	Negligible; given dilute nature, aqueous form, use of PPE, exposure is negligible.
	135 Metals Development	Anderson	Beryllium oxide ceramic tubes (a.k.a. stopper rods) used on high temperature melts for high pressure gas atomization runs	Negligible; Be is part of rod; rod is not consumed nor is any beryllium-containing material aerosolized
Wilhelm, Metals Development Spedding Halls	Interstitial & minimal access laboratory spaces	Grootveld	Residual beryllium contamination exists in utility spaces including sub-basement areas and ventilation shafts. Residual beryllium may also be present in isolated inaccessible horizontal surfaces in laboratory spaces.	Minimal; Be surface concentrations are low but above DOE-defined clearance levels; areas are only accessible to Facilities and Engineering Services workers; PPE including respirators worn when entering these spaces; air monitoring conducted during remediation of ventilation stacks showed no detectable levels of airborne Be.

Table 1 – Ames Laboratory Beryllium Inventory

6.10 Regulated Areas (850.26)

Ames Laboratory does not currently have any beryllium-containing/using areas that meet the definition delineated in Section 850.26 (i.e. areas where airborne concentrations are at or above the action level). Some areas, such as the sub-basement of Wilhelm, have areas where surface beryllium concentrations have been measured that are above DOE clearance levels. These areas are accessed by Facilities and Engineering Services workers wearing appropriated PPE including respiratory protection.

6.11 Hygiene Facilities and Practices (850.27)

It is not anticipated that hygiene facilities, as defined in Section 850.27, will be necessary. Facilities and Engineering Services in these areas already work under the requirements of a Radiological Work Permit (RWP) which includes use of Tyvek suits and respirators. The RWP includes any potential decontamination issues associated with exiting regulated areas. The decontamination procedures for radiological contamination would adequately address beryllium contamination as well.

6.12 Respiratory Protection and Protective Clothing (850.28 & 850.29)

All Ames Laboratory employees who enter areas where surface beryllium contamination has been identified will wear a NIOSH-approved respirator and be on the Laboratory's Respiratory Protection Program. As stated previously, employees entering areas in the Wilhelm sub-basement area with potential surface beryllium concentration are required to wear a respirator and other protective equipment as a result of meeting the requirements of the Radiological Work Permit.

6.13 Housekeeping (850.30)

Section 850.30 requires that an employer must conduct routine surface sampling to determine housekeeping conditions in "operational areas of DOE facilities". Operational areas, as defined by the standard, means areas "where workers are routinely in the presence of beryllium as part of their work activity." Ames Laboratory has identified several restricted access areas (utility chaises) that have beryllium surface contamination that exceeds the 3.0 microgram per 100 square centimeter removable contamination level established in this section of the standard. Surface sampling for beryllium continues as these areas are accessed for facility renovation. Facilities and Engineering Services workers where appropriate personal protective equipment when in areas with potential for surface levels exceeding the DOE limit and are under ESH&A surveillance due to radiological issues that are also present.

6.14 Release criteria (850.31)

This section of the standard applies to the cleaning and release of beryllium-contaminated equipment. This section does not currently apply to activities or equipment at Ames Laboratory. In the unforeseen situation that a piece of contaminated equipment is discovered, Ames Laboratory will abide by the requirements of this section.

6.15 Waste disposal (850.32)

Any beryllium-containing will be managed in accordance with the Ames Laboratory Waste Management Program.

6.16 Beryllium emergencies (850.33)

The standard defines a beryllium emergency as an event that “results in an unexpected and significant release of beryllium at a DOE facility”. This section does not currently apply to activities at Ames Laboratory.

6.17 Medical surveillance (850.34)

The standard requires that Ames Laboratory “establish and implement a medical surveillance program for beryllium-associated workers who voluntarily participate in the program.” A beryllium-associated worker “means a current worker who is or was exposed or potentially exposed to airborne concentrations of beryllium at a DOE facility including (1) A beryllium worker; (2) A current worker whose work history shows that the worker may have been exposed to airborne concentrations of beryllium at DOE facility; (3) A current worker who exhibits signs or symptoms of beryllium exposure; and (4) A current worker who is receiving medical removal protection benefits.” Ames Laboratory Facilities and Engineering Services workers meet definition (2) and are therefore included in the medical surveillance program. Medical surveillance services are provided by the Occupational Medicine department in G11 TASF and the Occupational Medicine department is a resource to all employees on any medical questions related to beryllium. Current workers are also eligible for inclusion in the Beryllium-Associated Worker Registry.

6.18 Medical removal (850.35)

See verbiage in Section 6.17.

6.19 Medical consent (850.36)

See verbiage in Section 6.17.

6.20 Warning signs and labels (850.38)

In accordance with this section, warning signs have been placed at each entry to the restricted access areas referenced earlier. Containers of beryllium-containing chemicals in laboratories are labeled in accordance with the Hazard Communication Standard (29 CFR 1910.1200). Areas such as interstitial spaces and ventilation systems with beryllium contamination above relevant DOE limits will be placarded with beryllium-specific hazard information.

7.0 POST PERFORMANCE ACTIVITY

7.1 Recordkeeping and use of information (850.39)

All recordkeeping or documentation related to the beryllium inventory, hazard assessments, exposure measurements and controls will be maintained by the Certified Industrial Hygienist. All recordkeeping or documentation related to medical surveillance will be maintained by the Occupational Medicine department.

7.2 Performance feedback (850.40)

The standard requires that the employer “conduct periodic analyses and assessments of monitoring activities, hazards, medical surveillance, exposure reduction and minimization, and occurrence reporting data. This review will be conducted annually by the Certified Industrial Hygienist.